

1 Joseph H. Harrington
2 United States Attorney
3 Eastern District of Washington
4 Stephanie A. Van Marter
5 Assistant United States Attorney
6 Post Office Box 1494
7 Spokane, WA 99210-1494
8 Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Jun 19, 2018

SEAN F. McAVOY, CLERK

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 REYNALDO PEREZ MUNOZ,

15 Defendants.

4:18-CR-6008-EFS

SUPERSEDING INDICTMENT

Vio: 21 U.S.C. § 846
Conspiracy to Distribute 50 Grams
or More of Actual (Pure)
Methamphetamine, 5 Kilograms or
More of Cocaine, and 1 Kilogram
or More of Heroin (Count 1)

Vio: 18 U.S.C. § 1956(a)(1)(B)(i)
Money Laundering
(Counts 2, 3, and 4)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii) and 18 U.S.C. § 2
Possession with the Intent to
Distribute 50 Grams or More of
Actual (Pure) Methamphetamine
(Count 5)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(i) and 18 U.S.C. § 2
Possession with the Intent to
Distribute 1 Kilogram or More of
Heroin (Count 6)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(vi) and 18 U.S.C. § 2
Possession with the Intent to
Distribute 5 Kilograms or more of
Cocaine (Count 7)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(ii) and 18 U.S.C. § 2
Possession with the Intent to
Distribute 400 Grams or more of
Fentanyl (Count 8)

21 U.S.C. § 853, 18 U.S.C. § 982
Forfeiture Allegations

The Grand Jury Charges:

COUNT 1

Beginning on a date unknown but by on or about December 19, 2017,
continuing until on or about February 14, 2018, in the Eastern District of
Washington and elsewhere, the Defendants, [REDACTED], REYNALDO
PEREZ MUNOZ, [REDACTED] did knowingly
and intentionally combine, conspire, confederate and agree together with each
other and other persons, both known and unknown to the Grand Jury, to commit
the following offense against the United States, to wit: distribution of 50 grams or
more of actual (pure) Methamphetamine, a Schedule II controlled substance, 5
kilograms or more of a mixture or substance containing a detectable amount of
Cocaine, a Schedule II controlled substance, and 1 kilogram or more of a mixture

1 or substance containing a detectable amount of Heroin, a Schedule I controlled
2 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(i), (ii), (viii); all in
3 violation of 21 U.S.C. § 846.
4

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
COUNT 2

On or about December 21, 2017, in the Eastern District of Washington, the
Defendant, REYNALDO PEREZ MUNOZ, did knowingly conduct and attempt to
conduct a financial transaction affecting interstate and foreign commerce, to wit:
the transfer, delivery and other disposition of \$380,070.00 in U.S. funds at the
direction of a target subject which involved the proceeds of a specified unlawful
activity, that is conspiracy to distribute and the distribution of controlled
substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing
that the transaction was designed in whole or in part to conceal and disguise the
nature, the location, the source, the ownership, and the control of the proceeds of
the specified unlawful activity, and that while conducting and attempting to
conduct such financial transaction knew that the property involved in the financial
transaction, that is funds in the amount of \$380,070.00 represented the proceeds of
some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and
2.

COUNT 3

On or about January 9, 2018, in the Eastern District of Washington, the

1 Defendants, REYNALDO PEREZ MUNOZ and [REDACTED], did
2 knowingly conduct and attempt to conduct a financial transaction affecting
3 interstate and foreign commerce, to wit: the transfer, delivery and other disposition
4 of \$630,200.00 in U.S. funds at the direction of a target subject which involved the
5 proceeds of a specified unlawful activity, that is conspiracy to distribute and the
6 distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1),
7 (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part
8 to conceal and disguise the nature, the location, the source, the ownership, and the
9 control of the proceeds of the specified unlawful activity, and that while
10 conducting and attempting to conduct such financial transaction knew that the
11 property involved in the financial transaction, that is funds in the amount of
12 \$630,200.00 represented the proceeds of some form of unlawful activity in
13 violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

14
15
16
17
18
19
20 COUNT 4

21 On or about February 2, 2018, in the Eastern District of Washington, the
22 Defendants, REYNALDO PEREZ MUNOZ and [REDACTED], did
23 knowingly conduct and attempt to conduct a financial transaction affecting
24 interstate and foreign commerce, to wit: the transfer, delivery and other disposition
25 of \$280,000.00 in U.S. funds at the direction of a target subject which involved the
26 proceeds of a specified unlawful activity, that is conspiracy to distribute and the
27
28

1 distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1),
2 (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part
3 to conceal and disguise the nature, the location, the source, the ownership, and the
4 control of the proceeds of the specified unlawful activity, and that while
5 conducting and attempting to conduct such financial transaction knew that the
6 property involved in the financial transaction, that is funds in the amount of
7 \$280,000.00 represented the proceeds of some form of unlawful activity in
8 violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

12 COUNT 5

13
14 On or about February 14, 2018, in the Eastern District of Washington, the
15 Defendants, [REDACTED], [REDACTED], [REDACTED], [REDACTED],
16 [REDACTED], knowingly and intentionally possessed with intent to distribute 50
17 grams or more of actual (pure) methamphetamine, a Schedule II controlled
18 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii) and 18 U.S.C. § 2.

21 COUNT 6

22
23 On or about February 14, 2018, in the Eastern District of Washington, the
24 Defendants, [REDACTED], [REDACTED], [REDACTED], [REDACTED],
25 [REDACTED], knowingly and intentionally possessed with intent to distribute 1
26 kilogram or more of a mixture or substance containing a detectable amount of
27 heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1),
28

1 (b)(1)(A)(i) and 18 U.S.C. § 2.

2
3 COUNT 7

4 On or about February 14, 2018, in the Eastern District of Washington, the
5 Defendants, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED], knowingly and intentionally possessed with intent to distribute 5
7 kilograms or more of a mixture or substance containing a detectable amount of
8 cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1),
9
10 (b)(1)(A)(ii) and 18 U.S.C. § 2.

11
12 COUNT 8

13
14 On or about February 14, 2018, in the Eastern District of Washington, the
15 Defendants, [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED], knowingly and intentionally possessed with intent to distribute 400
17 grams or more of a mixture or substance containing a detectable amount of N-
18 phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a
19
20 Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1),
21
22 (b)(1)(A)(vi) and 18 U.S.C. § 2.

23
24 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

25 The allegations contained in this Superseding Indictment are hereby
26
27 realleged and incorporated by reference for the purpose of alleging forfeitures
28 pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 982.

1 CONTROLLED SUBSTANCE FORFEITURES

2 Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of
3
4 21 U.S.C. §§ 841, 846 or 21 U.S.C. § 841, as set forth in this Superseding
5 Indictment, the Defendants, [REDACTED] [REDACTED], REYNALDO PEREZ
6 MUNOZ, [REDACTED] [REDACTED] [REDACTED] [REDACTED],
7
8 shall forfeit to the United States of America, any property constituting, or derived
9
10 from, any proceeds obtained, directly or indirectly, as the result of such offense(s)
11 and any property used or intended to be used, in any manner or part, to commit or
12 to facilitate the commission of the offense(s). The property to be forfeited
13
14 includes, but is not limited to, the following:

15 DEFENDANT [REDACTED] Counts 1 and 5 - 8:

16 U.S. CURRENCY

17
18 -\$172,390.28 in U.S. currency, seized by the Federal Bureau of
19 Investigation on or about February 14, 2018.

20 FIREARMS/AMMUNITION

- 21
22 - Kimber Pro Carry II with magazine, serial number: KR241904;
23 - six (6) rounds of Hornady .45 ammunition;
24 - Premier Trail Blazer .22 rifle, serial number: 3735K;
25 - .223 Rifle with magazine, unknown make and model, no serial number;
26 - Nineteen (19) rounds of .223 ammunition;
27 - one box containing six (6) rounds of .45 ammunition;
28 - one bag containing two (2) rounds of .223 ammunition;
 - Twenty-five (25) rounds of .45 ammunition;

- Colt 1911 style pistol with blue grip and (2) magazines, serial number: 38SS07763;
- Colt 1911 style pistol with white grip and (2) magazines, serial number: 38SS07790;
- Ruger SR 9 with (two) magazines, serial number: 331-97592;
- Taurus 1911 style pistol with chrome receiver, gold colored accents and black grip with (2) magazines, serial number: LCM58208;
- Mixed ammunition;
- Two (2) rifle magazines and one (1) pistol magazine; and, a
- Box of 9mm ammunition.

DEFENDANT REYNALDO PEREZ MUNOZ Count 1:

U.S. CURRENCY

- \$172,390.28 in U.S. currency, seized by the Federal Bureau of Investigation on or about February 14, 2018.

REAL PROPERTY

All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, known as 1703 N. 17th Avenue, Pasco, Washington, legally described as follows:

Lot 10, Block 2 Lindner Addition, according to the plat thereof recorded in Volume C of Plats, Page 25, records of Franklin County, Washington

Assessor's Parcel No.: 113352300

//

//

//

//

1 DEFENDANT [REDACTED] Counts 5 - 8:

2 U.S. CURRENCY

3
4 - \$172,390.28 in U.S. currency, seized by the Federal Bureau of
5 Investigation on or about February 14, 2018.

6 FIREARM

7 - Mossberg .22 caliber rifle, serial number: EMJ3962984.

8 DEFENDANT [REDACTED] Count 1:

9
10 REAL PROPERTY

11 All that lot or parcel of land, together with its buildings,
12 appurtenances, improvements, fixtures, attachments and
13 easements, known as 1703 N. 17th Avenue, Pasco, Washington,
14 legally described as follows:

15 Lot 10, Block 2 Lindner Addition, according to the plat thereof recorded in
16 Volume C of Plats, Page 25, records of Franklin County, Washington

17 Assessor's Parcel No.: 113352300

18
19 If any of the property described herein, as a result of any act or omission of
20 the Defendant(s):

- 21
22 a. cannot be located upon the exercise of due diligence;
23 b. has been transferred or sold to, or deposited with, a third party;
24 c. has been placed beyond the jurisdiction of the court;
25 d. has been substantially diminished in value; or
26 e. has been commingled with other property which cannot be divided
27 without difficulty,
28

1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).

3
4 MONEY LAUNDERING FORFEITURES

5 Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of a money laundering
6 offense(s) in violation of 18 U.S.C. § 1956, as charged in this Superseding
7 Indictment, Defendants [REDACTED] [REDACTED] REYNALDO PEREZ MUNOZ
8 shall forfeit to the United States of America, any property, real or personal,
9 involved in such offense, and any property traceable to such property. The
10 property to be forfeited includes, but is not limited to, the following:
11
12

13
14 DEFENDANT [REDACTED] Counts 3 and 4:

15 MONEY JUDGMENT

16
17 -A sum of money equal to \$630,200.00 in United States currency
18 representing the total amount involved in the money laundering
19 offense charged in Count 3 of this Indictment.

20 U.S. CURRENCY

21 -Approximately \$280,031.00 in United States currency, seized by the
22 Federal Bureau of Investigation, on or about February 2, 2018, which
23 currency was involved in the money laundering offense charged in
24 Count 4 of this Indictment.

25 DEFENDANT REYNALDO PEREZ MUNOZ Counts 2 – 4:

26 REAL PROPERTY

27 - All that lot or parcel of land, together with its buildings,
28 appurtenances, improvements, fixtures, attachments and

1 easements, known as 1703 N. 17th Avenue, Pasco, Washington,
2 legally described as follows:

3 Lot 10, Block 2 Lindner Addition, according to the plat thereof recorded in
4 Volume C of Plats, Page 25, records of Franklin County, Washington

5 Assessor's Parcel No.: 113352300

6
7 MONEY JUDGMENT

8 -A sum of money equal to \$380,070.00 in United States currency
9 representing the total amount involved in the money laundering
10 offense charged in Count 2 of this Indictment.

11 MONEY JUDGMENT

12 -A sum of money equal to \$630,200.00 in United States currency
13 representing the total amount involved in the money laundering
14 offense charged in Count 3 of this Indictment.

15 U.S. CURRENCY

16
17 -Approximately \$280,031.00 in United States currency, seized by the
18 Federal Bureau of Investigation, on or about February 2, 2018, which
19 currency was involved in the money laundering offense charged in
20 Count 4 of this Indictment.

21 If any forfeitable property, as a result of any act or omission of the

22 Defendant(s):


- 23 a. cannot be located upon the exercise of due diligence;
24 b. has been transferred or sold to, or deposited with, a third party;
25 c. has been placed beyond the jurisdiction of the court;
26 d. has been substantially diminished in value; or
27 e. has been commingled with other property which cannot be divided
28 without difficulty,

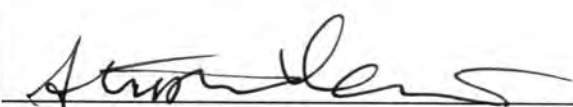
1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28
3 U.S.C. § 2461(c).

4 DATED this ____ day of June 2018.

5
6 A TRUE BILL

7
8 
9 Foreperson

10 
11 Joseph H. Harrington
12 United States Attorney

13 
14 Stephanie A. Van Marter
15 Assistant United States Attorney
16
17
18
19
20
21
22
23
24
25
26
27
28